

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RYAN CHANDLER,

Plaintiff,

-against-

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

CITY OF MT. VERNON,
POLICE OFFICER PATRICK KING,
POLICE OFFICER ROBERT G. PUFF,
POLICE OFFICER MICHAEL P. MOCULSKI,
and POLICE OFFICER PHILLIP J. LEONTI,

19 CV 10950 (JCM)

Defendants.

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Plaintiff, RYAN CHANDLER, by and through counsel, Alexis G. Padilla, Esq., proposes the following voir dire questions in addition to the Court's standard questionnaire:

1. Name a famous person you admire.
2. Have you or has anyone in your immediate family ever worked in law enforcement?
3. Has anyone in your extended family ever worked in law enforcement?
4. Do you have any friends who have ever worked in law enforcement?
5. If married or otherwise coupled, does your spouse or partner have any friends or family who have ever worked in law enforcement?
6. If yes to any of the above, in what capacity?
7. Are you now or have you ever been a member of the United States Armed Forces?
8. Have you ever served in the armed forces of any other country?
9. Have you ever been licensed to own a firearm?
10. Have you or anyone close to you ever been the victim of a crime?
11. Do you believe that testimony from a police officer is more credible than testimony from a civilian?

12. Do you hold any strong opinions which might prevent you from being a fair and unbiased juror in a civil matter involving police?

13. Is there any reason why you think you would not be a fair and unbiased juror in a civil matter involving police?

Dated: November 22, 2021
White Plains, NY

Respectfully submitted,

/s/ Alexis G. Padilla
ALEXIS G. PADILLA, ESQ.
Attorney for Ryan Chandler